



# BakerHostetler

November 24, 2020

**VIA ECF**

Hon. Katharine H. Parker  
United States District Court,  
Southern District of New York  
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New York, NY 10007-1312

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**The Clerk of Court is directed to seal the Complaint, ECF  
No. 1**

**SO ORDERED:**

**HON. KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE**

**11/25/2020**

*Re: Intrepid Financial Partners, LLC v. Antonio C. Fernandez, Case No.: 1:20-cv-09779*

Dear Judge Parker:

We represent plaintiff Intrepid Financial Partners, LLC in the above-referenced matter.  
Pursuant to your Honor's Individual Practice Rule III.d, we respectfully submit this letter motion  
to request that the Court (1) seal the Complaint, ECF No. 1, and permit plaintiff to file a redacted  
version of the Complaint in the form attached to this letter as Exhibit A; and (2) permit plaintiff  
to file under seal an unredacted version of Exhibit A to Mr. Winchenbaugh's declaration, ECF  
No. 7-1.

The information plaintiff seeks to redact or has already filed as redacted in the referenced documents is narrowly limited to defendant's personal financial compensation information. Mr. Fernandez's personal financial compensation information was accidentally included in the Complaint. As such, a redaction is warranted here, where plaintiff is currently in the process of hiring a replacement for Mr. Fernandez and disclosure of his compensation would be prejudicial to plaintiff, and to protect Mr. Fernandez's privacy interest. *See Oliver Wyman, Inc. v. Eielsen*, 282 F. Supp. 3d 684, 706 (S.D.N.Y. 2017); *see, e.g., Murray v. UBS Sec., LLC*, No. 14 CIV. 927 (KPF), 2017 WL 1498051, at \*6 (S.D.N.Y. Apr. 25, 2017) (redacting salary information).

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Counsel has conferred with defendant, and defendant consents to plaintiff's request.  
Accordingly, plaintiff respectfully requests that the Court grant its application and enter an order  
sealing the Complaint, ECF No.1.

Respectfully submitted,



Tiffany A. Miao

cc: John Siegal, Esq.  
Tina Solis, Esq.  
Daniel Schnapp, Esq.  
Christina Kurow, Esq.